

INTRODUCTION

Wisconsin's plan was designed with the purposes of TANF block grant, described under Section 401 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as its foundation. Wisconsin's TANF program seeks to provide the necessary training, supportive services and financial incentives for low-income parents to obtain permanent and stable employment with access to further training that will lead to career advancement.

In September 1997, the Wisconsin Works (W-2) program was implemented statewide. W-2's success lies in its philosophy that most individuals can become valuable members of the workforce, and all are capable of making some contribution through work. Under W-2, parents are afforded the opportunity to provide for their own family and enjoy the pride inherent in self-reliance. This is accomplished through the provision of short-term education and training coupled with work training activities that are transferable to regular unsubsidized employment.

While W-2 remains the core of Wisconsin's TANF program, new challenges and opportunities have provided the impetus for other innovative undertakings:

The flexibility afforded states under the TANF block grant combined with a significantly reduced cash assistance caseload has enabled Wisconsin to invest in initiatives that more broadly focus on the employment needs of low-income families. Participants who begin employment may receive child care and transportation assistance, job survival/retention techniques, and guidance in making career decisions. Initiatives that came about after implementation of W-2, such as Workforce Attachment and Advancement and the Employment Transportation Program, ensure that low-income working parents have access to a wide range of work supports to address their employment needs as well as training opportunities to advance in the workplace.

In the process of reexamining how Wisconsin's employment system could more effectively serve low-income parents, the Department also recognized the need to make internal changes. The resulting integration of the former Divisions of Economic Support and Workforce Excellence into one Division of Workforce Solutions, has enabled the Department to look at all of its programs as a spectrum of services with the goal of promoting upward mobility and lifelong learning for all of Wisconsin's workforce.

As W-2 agencies continue to transition participants into unsubsidized employment, the remaining caseload is comprised mainly of individuals with more severe barriers to employment. Those individuals who would have been exempt from participating under the old welfare system must now engage in activities that will prepare them for employment. As a result, greater emphasis is being placed on identifying the most effective strategies for helping the harder-to-serve population enter the workforce. For example, the Department is developing a more comprehensive screening and assessment process to ensure that participants' barriers are identified upfront and appropriate services and accommodations are provided to address those barriers.

Finally, there are initiatives within Wisconsin's TANF program that seek to promote personal responsibility and career development among other family members. Programs such as Brighter Futures engage teenagers in constructive activities that put them on track for personal self-sufficiency as they reach adulthood. Comparatively, non-custodial parents are offered work training and supportive services through the Children First and Workforce Attachment and

Advancement programs, empowering them to meet their children's as well as their own financial needs.

GENERAL PROVISION ASSURANCES

Under the TANF plan, with the exception of Safety Services and Child Welfare Prevention Services, Wisconsin will provide services to needy families at or under 250 percent of the Federal Poverty Level (FPL) with the level of services provided varying according to income and assets as outlined in the plan. For those two programs that fall under the fourth purpose of the TANF program (i.e., Encourage the formation and maintenance of two-parent families), there are no income limits in place.

The State ensures the following:

1. Wisconsin's TANF program is designed to serve all political subdivisions in the State (not necessarily in a uniform manner), provide assistance to needy families with (or expecting) children, and provide parents with job preparation, work and support services to enable them to leave the program and become self-sufficient.
2. The program will require a parent or caretaker receiving assistance to engage in work (as defined by the State) once the State determines that the parent or caretaker is able to engage in work, or once the parent or caretaker has received assistance under the program for 24 months (whether or not consecutive), whichever is earlier.
3. Parents and caretakers receiving assistance under the program shall be engaged in work activities in accordance with section 407.
4. Reasonable steps shall be taken to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal government. Chapter 49 of Wisconsin State Statutes details the restrictions on disclosure of information for Wisconsin's TANF programs.
5. Goals shall be established and action taken to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and numerical goals shall be established for reducing the illegitimacy ratio of the State.
 - Wisconsin provides funding for projects to address adolescent pregnancy prevention, adolescent parent self-sufficiency, pregnancy counseling and adolescent parenting skills. Based on knowledge gained from currently funded programs and initiatives, the Wisconsin Department of Health and Family Services (DHFS) in coordination with the Department of Workforce Development (DWD) developed the *Wisconsin Plan to Prevent Adolescent Pregnancy*, a comprehensive state plan to reduce out-of-wedlock pregnancies. This plan focuses on three equally important key elements for all of Wisconsin's children and adolescents: health, nurturing and education.
 - The Adolescent Pregnancy Prevention Committee is co-chaired by division administrators within DWD and DHFS and is made up of public and private sector members from around the state (including provider agencies, the Wisconsin Department of Public Instruction, the legal system, United Way, the State Medical Society, public health agencies, the faith community, private businesses, local government, the media, and teens and parents). This committee developed the plan and is a partner in its implementation. A series of community meetings were held around the state to gain

citizen input on the development of the plan. DHFS completed the plan in January 1998. Sub-committees continue to meet on a quarterly basis to ensure progress is being made in reaching the goals outlined in the plan.

- This plan established goals and actions to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on adolescent pregnancies. Through the implementation of this plan, by the year 2001, Wisconsin expects to achieve a 15 percent decline from the 1995 pregnancy rate for females age 19 and under. Wisconsin will know by Spring 2003 whether this goal was achieved. The standard upon which this plan is based is one of abstinence. Special areas of concern are subsequent pregnancies, child abuse and neglect, and sexual abuse/statutory rape.
 - Although minor parents living outside of an adult supervised living arrangement are not eligible to receive cash assistance under Wisconsin Works (W-2), the W-2 agencies have been directed by the DWD to put special emphasis on providing case management services to minor parents, regardless of their income, assets, or living arrangement. All minor parents are eligible to meet with a Financial and Employment Planner (FEP) and receive W-2 case management services. Case management may include discussions on family planning, money and time-management, career planning, and parenting and independent living skills. The FEP may also provide a minor parent with information regarding available child care services, high school and school-to-work preparation, community resources, and eligibility for food stamps, other food and nutrition programs and Medicaid. Eligibility determination for these other programs will be completed according to individual program eligibility rules.
 - W-2, through its policies, encourages both parents to delay having additional children until the family is more financially secure. There are several ways the W-2 program encourages the prevention and reduction of the incidence of out-of-wedlock pregnancies for the adult population served by W-2: 1) Flat grants: Like employment, W-2 provides cash payments based on participation, not family size. If an individual fails to participate, his or her payment is reduced by \$5.15 per hour. 2) Family cap: W-2 does treat parents who have additional children while on assistance differently. Parents caring for a child under 12 weeks old may be eligible to receive, as a "short term, non-recurrent benefit," a stipend to cover their living expenses that does not carry a work requirement. However, parents receiving such payments are exempt from time limits only if the child is born less than ten months after the individual was first determined eligible for W-2 (or if the birth was the result of sexual assault or incest). 3) Case management: FEPs may counsel participants to delay subsequent births or provide referrals to family planning services.
 - As part of the Case Management Training Series, Wisconsin is providing a participant guide on Employment-Focused Family Planning. The base of information developed will continue to be utilized in W-2 to assist participants in making choices about their career and family, encourage the use of resources available to them and make appropriate referrals based on their needs. Each W-2 agency will maintain a list of family planning referral agencies and health care providers.
6. A number of state and local initiatives are under way in Wisconsin to address the problem of statutory rape so that teenage pregnancy prevention programs are expanded in scope to include men. Examples of these efforts include:

- Training and inservices to educators through the Department of Public Instruction on the topic of reporting requirements for sexually active adolescents.
- The Wisconsin DHFS plan to reduce adolescent pregnancies addresses the issue of male responsibility, with programs developed for adolescent males.
- A locally-developed video series called *Sexuality, Attitudes and Awareness* is used to educate individuals on the legal issues and consequences of violating child sexual assault laws. The program is used with individuals who may benefit from the information as determined by the courts, a district attorney or a probation and parole officer.
- The Wisconsin State Legislature passed a law in 2001 that requires Child Protective Services (CPS) Agencies to refer all cases of suspected or threatened child sexual abuse to law enforcement. In turn, the law enforcement agency and CPS must coordinate the planning and execution of the report. Any law enforcement agency that determines that criminal action is necessary must refer the case to the District Attorney for criminal prosecution. DHFS is working to develop collaborative protocols for these investigations.

PUBLIC INPUT

Through the biennial budget process, the Legislature's Joint Finance Committee meetings and other public forums, there is ongoing public dialogue regarding the Wisconsin TANF program. The Department took a number of steps to publicize the availability of the draft Federal Fiscal Year (FFY) 2002-FFY 2003 TANF Plan as a means of soliciting comments from the public. Information on the draft TANF plan was presented in October 2001 at the regular monthly meeting of the W-2 Contract and Implementation Committee.

In mid-October 2001, the Department mailed out information regarding the availability of the draft plan on the Department's website and the opportunity to comment on the plan through the public hearing process, by e-mail or regular mail. Information about how to obtain a hard-copy of the draft plan was also provided. The information went to 600 groups and individuals, including W-2 agencies, Division of Workforce Solutions (DWS) Area Administrators and Assistant Area Administrators, child care coordinators, child support agencies, directors of county departments of human services and social services, tribal economic support directors and the Great Lakes Intertribal Council. A number of other local provider and advocacy organizations were mailed information through an interagency workgroup called the Milwaukee W-2 Advisory Panel.

As part of this public comment process, the Department scheduled and conducted a public hearing in Madison on November 6, 2001, from 1:00 p.m. to 4:00 p.m. A notice of this hearing was placed on the Department's website on October 22, 2001 and published in the Wisconsin State Journal on October 28, 2001. The public hearing notice included information on who to contact at the Department to obtain a copy of the plan, how to access the plan on the Department's website, information about providing testimony at the public hearing, and the opportunity to submit written comments. Written comments on the plan were accepted by the Department for consideration through December 10, 2001.

The Department received a number of comments on the plan via e-mail, regular mail and through the public hearing. The comments included recommendations for language changes within the state plan, for state statutory changes and for changes in how the TANF program is administered. All comments were considered and two changes were made to the plan as a result.

FEDERAL TANF PROGRAMS W-2 PROGRAM DELIVERY SYSTEM

W-2 Program Access

W-2 agencies were awarded W-2 contracts for the period January 1, 2002, through December 31, 2003. There are currently 61 W-2 Agencies in 77 regions of the state. The agencies include a combination of public and private agencies, selected through a competitive process and Right of First Selection.

Fifteen W-2 Regions are Operated by Five Private Non-Profit Agencies

Forward Services Corporation - Kewaunee; Florence; Waushara
Forward Services Corporation - Northern Consortium – Forest; Oneida; Vilas; Langlade
Workforce Connections Inc. Consortium – Juneau; Monroe; Jackson
Workforce Connections Inc. - Columbia
UMOS - Milwaukee County Region II and V
Opportunities Industrialization Center of Greater Milwaukee - Milwaukee County Region III
Shawano County Job Center - Shawano

Five W-2 Regions are Operated by Four Private For-Profit Agencies

MAXIMUS - Milwaukee County Region VI
ACS - Waukesha
Kaiser Group - Walworth
YW Works – Milwaukee County Region I and Region IV

Fifty-seven W-2 Regions are Operated by County Agencies

Fifty-two W-2 agencies are county human/social services agencies including one county consortium acting on behalf of four additional county human/social services agencies, and another county agency acting on behalf of an additional adjacent county.

In addition, six Tribes developed a TANF plan and are working directly with the federal government: Red Cliff, Stockbridge-Munsee, Potawatomi, Sokaogon, Lac du Flambeau, Oneida and Bad River.

All W-2 agencies are either collocated or electronically linked to Job Centers in each W-2 geographic area. Job Centers provide one-stop shopping for employers to meet workforce needs and for job seekers to obtain career planning, job placement and advancement, and training at the local level. Job Centers are open to all job seekers, including W-2 participants.

Financial and Employment Planner (FEP) Role

The FEP is central to W-2 integrated case management and is the primary individual who performs and/or monitors all case management services for the W-2 participant. This approach allows a simplified process for the participating family and is more likely to help build a supportive relationship between the participant and the FEP.

A FEP provides:

- W-2 eligibility determination
- W-2 employment position placement
- Employability Plan (EP) development
- Case management
- Referrals to the child support agency
- All other support services for a participant in a W-2 employment or work training position

Supportive Services Planner (SSP) Role

An applicant may decide to request only supportive services. If the applicant/participant is not eligible for, or does not request a W-2 employment position, the Supportive Services Planner (SSP) determines eligibility and provides for the delivery of services which may include:

- food stamps
- Medicaid/BadgerCare
- Emergency Assistance
- transportation assistance
- child care
- referrals to the child support agency

W-2 ELIGIBILITY

The primary purpose of W-2 is to prepare eligible parents, who are not job-ready, for unsubsidized employment to help them provide for their families and become self-sufficient members of the community in which they live. There are four categories of individual who may be eligible for services of the W-2 program:

- Custodial parents of minor children may access all W-2 services.
- Non-custodial parents, subject to a support order for a child, may receive case management services.
- Pregnant women, with no other born children, may receive case management services.
- All minor parents are eligible to receive W-2 case management services.

Applicants must meet both nonfinancial and financial eligibility criteria to be considered for a W-2 employment position, a Job Access Loan and certain case management services.

Income Limits

The W-2 group's income must be at or below 115 percent of the federal poverty level.

Asset Limits

The W-2 group's assets cannot exceed \$2,500, excluding the combined equity value of vehicles up to \$10,000 and one home that serves as the homestead.

Cooperation with Child Support

Applicants or participants must cooperate with child support enforcement efforts to be eligible for W-2 services. The determination of whether an applicant is cooperating with child support enforcement efforts is made by the child support agency. An applicant or participant may claim good cause for refusal to cooperate at any time during the application process or once found eligible for W-2 services. It is the W-2 agency's responsibility to make a determination of good cause in each case.

Residency Requirement

W-2 applicants must verify that they are currently residents of Wisconsin. With the exception of migrant workers, W-2 applicants must also demonstrate an intent to continue to reside in the state.

TANF assistance received by an adult in Wisconsin or any other state counts toward the 60-month time limit. When there is evidence that an applicant has received cash assistance in another state, the FEP must:

1. Determine the number of months TANF cash assistance was received in the other state by contacting the appropriate persons;
2. Take steps to ensure that the cash assistance received was, in fact, TANF cash assistance; and
3. Document that information in the case file for future calculation of eligibility.

The W-2 policy manual provides resource information to the FEPs on how to contact other states to verify if TANF benefits were received.

Accessing Other Sources of Income

A W-2 applicant may be required to apply for and accept other public assistance programs or resources that may be available, prior to being determined eligible for W-2 services. Applicants who refuse to cooperate are not eligible for a W-2 employment position or a Job Access Loan.

W-2 PROGRAM TIME LIMITS

60-Month Time-Limited W-2 Payment Policy

Both federal TANF and state W-2 legislation include a 60-month lifetime limit for eligibility. The time-limits were first applied to AFDC recipients participating in the Job Opportunities and Basic Skills (JOBS) program beginning on October 1, 1996. Therefore, the earliest a W-2 participant may reach the 60-month limit will be October 1, 2001. W-2 agencies may extend the time-limits on a case-by-case basis because of circumstances including:

1. The adult W-2 group member is unable to work because of personal disability or incapacitation;
2. The adult W-2 group member has significant limitations to employment;
3. The adult W-2 group member is needed in the home to care for another severely incapacitated group member; or
4. The adult group member has made all appropriate efforts to find work, and is unable to find unsubsidized employment because local labor market conditions preclude a reasonable job opportunity.

24-Month Time Limit for Subsidized Employment Positions

Participation in any W-2 employment and training position category (Trial Job, Community Service Job (CSJ), and W-2 Transition (W-2 T)) is limited to 24 cumulative months. Extensions to the time limits may be granted on a case-by-case basis.

W-2 EMPLOYMENT AND WORK TRAINING FOR CUSTODIAL PARENTS

W-2's goal is to connect parents with appropriate work or work training as soon as possible. This is done by immediate placement in a W-2 employment or work training level:

- Unsubsidized Employment
- Trial Jobs
- CSJs
- W-2 T

A participant enters the highest possible employment or work training level according to ability and is expected to move up to the next appropriate level at the earliest opportunity. Each new placement brings with it increased income and greater family self-sufficiency.

Unsubsidized Employment

Unsubsidized employment is the highest and most desirable level in this employment or work training system. The FEP must first consider unsubsidized employment for any W-2 applicant who has a strong employment history and skills. Individuals may be placed at this level if they are working in unsubsidized employment and do not have barriers to full-time employment, or they are unemployed, but have been assessed as having the capability of obtaining immediate full-time employment. There are no W-2 cash payments for individuals placed at this level and case management services are provided on a voluntary basis.

Case management services for employed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing guidance in career decision making skills;
- Exploring career options;
- Identifying vocational opportunities;
- Researching training information;
- Creating or updating a resume;
- Developing networking skills;
- Providing referrals to other community resources; and
- Providing job survival/retention techniques.

Case management services for unemployed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing assistance in creating a financial plan;
- Establishing employment goals;
- Providing information about job openings;
- Improving job interview skills;
- Completing job applications;
- Writing a resume;
- Arranging job interviews with employers; and
- Contacting employers on the individual's behalf.

Follow-Up Case Management Services

Participants who progress from a subsidized employment position to an unsubsidized position receive follow-up case management services for at least 6 months to support job retention. W-2 agencies may provide follow-up case management services beyond the mandatory 6-month period regardless of the individual's income and asset levels.

The case management services may include:

- Employment skills training;
- English-as-a-Second Language classes if the W-2 agency determines that the course will facilitate the individual's efforts to retain employment;
- A course of study meeting the standards for the granting of a declaration of equivalency of high school graduation; or
- Other remedial education courses.

Wisconsin encourages W-2 agencies to provide services beyond the 6-month period to prevent recidivism and ensure employment stability. There is no time limit on these services.

Subsidized Employment and Work Training

If good faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that an applicant is not prepared for unsubsidized employment, the applicant may be offered a W-2 work training placement. Individuals placed in one of the three W-2 work training placements, Trial Jobs, CSJs or W-2 T, may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency, while participating in a W-2 work training placement.

Trial Jobs

Trial Jobs are W-2 subsidized work training placements, intended to encourage employers to give permanent opportunities to individuals who appear job ready, but have a weak work history. The W-2 agency contracts with the employer and pays the employer a subsidy (up to \$300 per month) with the expectation that if the W-2 participant performs satisfactorily, the employer will offer that participant permanent employment. The wage subsidy to the employer may be used flexibly at the Trial Job employer's discretion for training, transportation, or as an offset to employment costs.

An individual may participate in a Trial Job for a maximum of three months with an opportunity for a three-month extension in the rare instances where the additional time is needed to assure job readiness. The total number of months an individual may participate at the Trial Job level is 24 months. The Trial Job employer must pay at least the minimum federal or state wage per hour and must pay wages and benefits comparable to those received by regular employees in similarly classified positions for every hour worked.

Community Service Jobs (CSJ)

The CSJ work training placement is for individuals who are determined not ready for immediate regular employment, particularly where attempts to place a participant in an unsubsidized or Trial Job have not succeeded. CSJs are intended to provide participants with an opportunity to develop or improve work habits and skills that are necessary to succeed in any regular job environment, including punctuality, reliability, work social skills (such as learning to get along with co-workers) and the application of a sustained and productive effort. A prorated CSJ placement may be appropriate for individuals who are already working in an unsubsidized job less than 30 hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded.

CSJ participants are generally expected to participate 40 hours per week - up to 30 hours per week of work training activities and up to 10 hours of education and training. CSJ participants eligible for a prorated CSJ payment are also expected to participate up to 40 hours per week in a combination of hours in their unsubsidized job, work training activities and education and

training activities. The participant is assigned CSJ activities that do not interfere with the hours they are expected to work at the unsubsidized job.

An individual is permitted to participate at the CSJ level for no more than 24 months. Each CSJ position may be scheduled for a period of up to six months with an opportunity for a three-month extension in the rare instances where readiness for regular employment is slow to develop. A monthly CSJ benefit is \$673 with a reduction of \$5.15 for each hour that the participant fails, without good cause, to participate in assigned activities. Prorated CSJ payments are based on the number of hours the participant is assigned to work training:

- 1/3 CSJ: \$230 for up to 10 hours of work training and up to 10 hours of education and training per week.
- 1/2 CSJ: \$341 for 11 to 15 hours of work training and up to 10 hours of education and training per week.
- 2/3 CSJ: \$452 for 16 to 20 hours of work training and up to 10 hours of education and training per week.

CSJ work training providers are expected to offer real work training opportunities with appropriate supervision within an environment which generally replicates that of regular employment, realizing that job coaching and mentoring may be needed to help the participant succeed.

CSJ participants may be required to participate up to 10 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include, but are not limited to:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- English-as-a-Second-Language; and
- Parenting, life skills, job skills or other adult basic education.

An 18 or 19 year old CSJ participant who has not obtained a high school diploma or a declaration of high school graduation may attend a high school or GED course of study to satisfy, in whole or in part, the required hours of participation in a CSJ.

W-2 Transition (W-2 T)

The W-2 T work training placement is for individuals who have been determined to have multiple barriers to employment and are unable to successfully participate in one of the other W-2 work training placements or unsubsidized employment for reasons such as alcohol or drug abuse; an individual's incapacitation; or the need to remain in the home to care for another W-2 group member who has a severe incapacitation or disability. An individual can participate in a W-2 T position for a maximum of 24 months. This period may be extended on a case-by-case basis by the W-2 agency.

Participants in W-2 T are placed in full-time activity whenever possible. An in-depth assessment is completed with appropriate professionals when necessary. Based on the results of the assessment, which takes into consideration the limits of ability, the participant may be assigned up to 28 hours per week of work training activities and 12 hours per week of education and training. A monthly W-2 T benefit is \$628 with a reduction of \$5.15 for each hour that the participant fails without good cause to participate in assigned activities.

W-2 T work training activities which may be approved by the W-2 agency include:

- Community rehabilitation program - a program that provides directly or facilitates the provision of vocational rehabilitation to individuals with disabilities and that enables an individual with a disability to maximize opportunities for employment;
- Activities similar to a CSJ but with more supervision; and
- Volunteer activity.

Other W-2 T activities which may be approved by the W-2 agency include:

- Alcohol and other drug abuse (AODA) services not covered by Medicaid, including evaluation, detoxification, assessment and treatment programs;
- Mental health activities, as prescribed by an appropriate health care professional;
- Counseling or physical rehabilitation activities;
- Court ordered activities;
- English-as-a-Second Language;
- Activities related to obtaining shelter or retaining safety in a domestic abuse situation or other activities needed to stabilize a family;
- Other activities that the agency determines are consistent with the capabilities of the participant;
- Caring for a family member with an incapacity of such severity that without home care, the incapacitated member's health and well-being would be significantly affected, as determined by the W-2 agency;
- Caring for a family member who is incapacitated to the degree that only marginal employment is attainable; and
- Activities to support the marginal employment and move the family with special needs closer to self-sufficiency (e.g. parenting, life skills classes, activities at the school, etc.).

W-2 T participants may be required to participate up to 12 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include, but are not limited to:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill; and
- Parenting, life skills, job skills or other adult basic education.

Technical College Participation Under CSJ and W-2 T

If the agency determines that an individual is unable to obtain unsubsidized employment without additional training, the participant may be allowed to participate in a technical college education program for a maximum of two years if the agency has determined that the program will likely lead to employment. An individual placed in a CSJ or W-2 T may participate in a technical college education program as part of that placement if all of the following requirements are met:

1. The participant maintains full-time status in the technical college education program, as determined by the technical college the participant attends, and regularly attends all classes;
2. The participant maintains a grade point average of at least 2.0 (or the equivalent, as determined by the technical college); and
3. The participant is employed or engages in work activities under a CSJ or W-2 T for 25 hours per week in addition to class time.

Assistance to Custodial Parent of an Infant

A custodial parent of a child who is 12 weeks old or less and who meets the financial and nonfinancial eligibility requirements for W-2 work training placements may receive a monthly payment of \$673 and will not be required to participate in an employment position unless s/he volunteers to participate. A parent may only receive the custodial parent of an infant benefit if no other adult member of the custodial parent's W-2 group is participating or eligible to participate in a W-2 work training placement or working in an unsubsidized job.

The custodial parent is eligible for benefits beginning on the date of the child's birth or the W-2 begin date, whichever is later. If the parent is still eligible for W-2 and not able to obtain unsubsidized employment when the child reaches 12 weeks, s/he may be immediately placed in a W-2 work training placement.

Two-Parent Family Participation

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. The first parent, the parent placed in a W-2 employment position, must participate in up to 40 hours of W-2 activities per week. If the family is also receiving federally funded child care, the other parent must participate in W-2 activities equal to the difference between 55 hours and the number of hours the parent who is placed in the employment position participates in assigned activities per week. The other parent may be assigned to activities including unsubsidized employment, on-the-job training (which is non-W-2 funded) or work training experience. Additional activities above the minimum required may be assigned based on a determination by the FEP that the activities will best prepare the other parent for unsubsidized employment.

The other parent in a two-parent family not receiving federally funded child care may be offered the opportunity to participate in W-2 activities, but participation is not mandatory. If the offer to participate in activities is accepted, the FEP identifies appropriate activities for both parents taking into consideration the schedules of the parents and children in order to accommodate the family's request not to receive child care.

OTHER ELEMENTS OF W-2 WORK-BASED PARTICIPATION

Employability Plan (EP)

An EP outlines employment goals developed jointly by the FEP and the participant. The EP may also identify basic and immediate family needs (food, clothing, shelter, health care, etc.) that are needed before the family can expect to achieve and/or maintain economic self-sufficiency.

W-2 Screening and Assessment

Participant assessment has been a core function of the FEP since implementation of W-2. As the caseload declined over the first few years of the W-2 program and the ratio of participants with significant employment barriers increased, greater emphasis needed to be placed on upfront services to identify barriers. As a result, a work plan centering on screening and assessment was implemented in 2001 that strengthened the focus on assessment in W-2 policy, performance standards, and W-2 agencies' program plans.

Simultaneous to the development of the Department's workplan, the Wisconsin State Legislature passed 2001 Wisconsin Act 16, requiring the Department to promulgate rules to implement screening for domestic abuse among W-2 participants and training for W-2 agency

staff in domestic abuse issues. Through the Department's authority to promulgate rules for the administration of the W-2 program, amendments were made to DWD 12 related to: 1) W-2 agency screening for domestic violence and training of agency workers in domestic violence; and 2) A requirement that W-2 agencies administer a functional screening process developed by the Department. This functional screen came to be known as the Barrier Screening Tool (BST).

Implemented in May 2003, the BST provides a more consistent process for determining participant barriers statewide. The tool is administered to new participants in order to identify the potential presence or risk of a personal barrier to normal functioning in an employment setting. The BST includes a functional screen that looks at the ability of the participant to function in activities of daily living and a domestic violence screen. Based on answers provided on the functional screen, a follow-up screen (a.k.a. Screen 2) may be triggered that looks more closely at conditions that often go unidentified but are significant barriers to the participant becoming employed. The conditions that Screen 2 looks at includes learning disabilities, trauma (e.g. Post Traumatic Stress Disorder), mental health, AODA and traumatic brain injuries.

The responses to the BST questions provided by each participant assist the FEP in determining if the participant could benefit from a formal assessment by a professional. The formal assessment results, in turn, enable the FEP to make a more informed decision about the participant's W-2 placement, the activities s/he is assigned to and any special services or work site accommodations that s/he may need.

The Department partnered with the University of Wisconsin-Milwaukee Center for Addiction and Behavioral Health Research to design the BST. Dr. Gwat Yong Lie and Dr. Susan Rose provided research and recommendations on various screening tools that have been tested and found to be valid and reliable with similar populations in other states.

Educational Needs Assessment

Agencies must conduct an educational needs assessment for any individual for whom they determine that the appropriate placement is Unsubsidized Employment or a Trial Job. If the individual is in need of basic education, including a course of study meeting the standards established for the granting of a declaration of equivalency of high school graduation, and the individual wishes to pursue basic education, the activity is included in the individual's Employability Plan (EP). Basic education activities identified may include:

- Writing skills;
- Math skills;
- Improving literacy;
- Remedial education;
- HSED/GED preparation classes;
- English-as-a-Second Language (ESL)

W-2 agencies must pay for the basic education services identified in the EP.

W-2 Fact Finding Process

Individuals who believe that an agency decision regarding any component of W-2 (e.g. employment positions, Job Access Loans, Child Care, Emergency Assistance) is incorrect may request a Fact Finding review by the W-2 agency. The W-2 agency must respond by completing an expeditious review of the case to prevent harm to the client in the event of an agency error. The Fact Finding review is an informal process to resolve issues, explain the

proposed action or inaction, and permit the petitioner to present information. Each W-2 agency must have at least one individual assigned to complete Fact Finding reviews. The fact finder must be neutral and provide an objective review and decision on the Fact Finding request. W-2 agencies are bound by the Fact Finding decision for a particular case and must comply with the decision within 10 days of the decision date.

A second level of review is completed by the Department of Administration, Division of Hearings and Appeals (DHA) if the applicant or participant petitions the DHA for a review of the W-2 Fact Finding decision. This review is limited to review of the record and the decision of the fact finder. The W-2 agency may also request DHA to review a Fact Finding decision at any time.

If a Fact Finding decision overturns the agency's action of denying W-2 payments, at either level of review, the W-2 agency shall place the individual in the first appropriate employment position. Payment begins on the date the individual begins participation and no retroactive cash payment for the period prior to participation shall be issued. The W-2 agency is required to restore any payments that were improperly calculated, reduced or terminated retroactive to the date of occurrence.

Child Care and W-2 Participation

A single parent placed in a CSJ or W-2 T position cannot be assigned work activities during a period of time s/he is unable to obtain child care for a child under the age of thirteen. However, the participant may be assigned to other activities which may be performed in the home. FEPs must track these participants closely to ensure they are placed in work activities as soon as a child care provider has been located.

An inability to obtain child care must be based on the following reasons:

1. **Formal child care is not available within a reasonable distance from the parent's home or work site.** Formal child care means at least one licensed or certified child care facility with space available for the child for which there is no documentation that the facility would be harmful to the health or safety of the child.

Reasonable distance means no more than 60 minutes travel time one-way, using available transportation, from the parent's home to the child care provider's location to the parent's work site. Travel time may be extended up to 90 minutes one-way if there is a good placement opportunity for the participant AND the participant is willing to enter into this arrangement.

and

2. **Informal child care by a relative or under other arrangements is unavailable or unsuitable.** Informal child care is defined as an arrangement in which the child care provider is neither licensed nor certified. Participants who use this type of arrangement are not eligible for W-2 child care assistance. Informal child care arrangements may be used by any W-2 participant; however, a participant cannot be required to use informal child care.

If the participant fails to demonstrate an inability to obtain child care, s/he must resume W-2 work activities or face payment reductions, or possibly a strike, for nonparticipation.

Community Involvement

Community involvement is another key aspect of the W-2 program. Collaboration between employers, community resources, the business community, advocate groups and government programs creates an environment that translates into jobs and positive community involvement for low-income workers statewide. Community Steering Committees are public/private partnerships established under legislation to provide ties to W-2 agencies, with strong leadership from the business sector. They serve as problem-solving boards to the local agencies and collaborate with the Children's Services Network, a one-stop access to all supportive services in the county that benefit children and families.

CASE MANAGEMENT SERVICES

Learnfare Case Management Services

Learnfare is a component of the W-2 program that requires all school age children of W-2 participants to be enrolled in school. Students who are not enrolled in school or who are dropouts, returning dropouts, habitual truants or minor parents are required to participate in case management. Learnfare case management focuses on services to maintain school enrollment, improve school attendance and prepare children for a career. For high school students, Learnfare case management focuses on graduation, career and/or employment planning, job readiness and job seeking/job retention activities. For minor parents, Learnfare case management also focuses on parenting and life skills. A financial penalty may be imposed for not being enrolled in school or not participating in case management, if required to do so. The financial penalty is in the amount of \$50 per month per child, not to exceed \$150 per W-2 group per month. A financial penalty must not be imposed on students who volunteer for case management. The FEP or Learnfare specialist determines if a student and his/her parent had good cause for failing to cooperate with Learnfare case management.

Case Management for Pregnant Women

A pregnant woman whose pregnancy is medically verified and who is both nonfinancially and financially eligible except that she is not a custodial parent of a dependent child is eligible for job search assistance and case management services provided by the W-2 agency. Case management services may include making the appropriate referral to access child care or discussing employment goals for the W-2 group when the child is over 12 weeks. A pregnant woman cannot be required to participate in an employment position until the child is 12 weeks old. There is no penalty for noncooperation with child support for a pregnant woman or while the child is less than 60 days old.

Minor Parent Case Management

Custodial parents are not eligible to participate in a W-2 work training placement until they have reached the age of 18. By eliminating eligibility for cash assistance for a minor, W-2 has created a stronger tie of responsibility to the adult parent and a better opportunity for the minor parent to complete high school and prepare for a career.

A custodial minor parent is eligible, regardless of income, assets, or living arrangement to meet with a FEP, who can provide a minor parent with information about available child care services, high school and school to work preparation, employment and financial planning, family planning services, community resources and eligibility for Medicaid, food stamps and other food and nutrition services.

A minor parent living independently is counseled by the W-2 agency on the importance of living in an adult-supervised living arrangement, beginning with the assumption that the best option is

for the minor to live with his or her parent(s). If needed, other living arrangements are discussed, such as living with a kinship care relative. In some cases, the W-2 agency must refer the minor parent to child welfare authorities and advocate for locating a suitable living arrangement.

Non-custodial Parent (NCP) Case Management

W-2 NCP case management is a voluntary program for the unemployed or underemployed NCPs. The W-2 agency may provide job search assistance and employment and training assistance as part of the case management provided to non-custodial parents to facilitate entry into the labor market and increase capacity to make consistent child support payments for the benefit of the minor child(ren). The goal is to enable W-2 custodial parents to become self-sufficient by ensuring regular child support payments in combination with employment. In addition, it is expected that by meeting their financial obligation, non-custodial parents will also demonstrate enhanced contact with, and emotional investment in their children.

In order for a NCP to be eligible for these services, s/he must be under a current child support order or in the process of having one established, and the custodial parent must be a W-2 participant.

OTHER FEATURES OF WISCONSIN'S TANF PROGRAM

Credit Establishment and Credit Repair Assistance

Financial literacy services, which include training on budgeting, obtaining and managing credit and overall money management, are one of the supports W-2 participants need to maintain self-sufficiency. To address this need, W-2 agencies provide or contract with another entity to provide credit establishment and credit repair assistance to W-2 participants to ensure their financial stability.

TANF Eligible Food Stamp Recipients

Wisconsin plans to use TANF funds for employment and training services for food stamp recipients who: 1) have income at or below 130 percent of the FPL; 2) are the custodial parents of minor children; and 3) are mandatory participants in the Food Stamp Employment and Training (FSET) program. These individuals will be eligible for the same services provided under W-2 with the exception of a placement in a W-2 employment position (i.e. Trial Job, CSJ, or W-2T). Eligible activities may include job readiness and motivational activities, employment counseling, job seeking skills training, job survival/retention training, life skills training, and short term education and training directly related to employment opportunities.

Community Reinvestment

Under the W-2 and Related Programs Implementation Contract, an amount equal to 3 percent of the total Contract is available to provide Community Reinvestment activities to TANF eligible families under 200 percent of FPL with no asset test. W-2 agencies that choose to access the CR funds must submit a plan to the Department outlining how those monies will be used. CR plans must be consistent with the requirements and purposes of TANF, and provide services allowable under TANF. Agencies were also instructed to carefully consider alternative options rather than spending CR funds on activities that would meet the federal definition of "assistance." Consequently, the vast majority of CR activities are not "assistance" as federally defined.

CR activities and services can supplement those provided under W-2 or help to fill in service gaps for the community. Particular emphasis is placed on those services which assist

individuals making the transition to full time employment. Agencies are required to focus on services that strengthen attachment to the workforce, increase participants' skills and education levels, provide parenting and life skills training, and broaden the availability and extent of supportive services such as child care or transportation.

Agencies will use CR funding to provide a broad array of non-monetary services not already described in this plan to families including: support for work activities, housing, transportation, education and training, child care, legal assistance, mental health services, AODA services, domestic abuse services, local telephone service, developmental and learning disabilities services, child welfare, family formation and pregnancy prevention activities, youth and employer services, and respite care. Agencies may use CR funds to sub-contract with clothing providers, food pantries, and other community organizations to provide employment-supportive resources to TANF-eligible families. Agencies must specify in their CR plans the services to be provided, and the plan approval and sub-contracting process is designed to ensure that costs charged to CR are for services to TANF-eligible families.

Examples of services provided using CR funding to enhance or supplement the family income or assets include programs such as: small business loans, Individual Development Accounts, job retention bonuses, job and school retention attendance bonuses, family development accounts, entrepreneurial programs, quick start loans, and other Community Reinvestment loans and grants.

Department of Health and Family Services

Safety Services

Under the administration of DHFS, the Safety Services program will provide up to five months of safety services to families referred by the assessment units of the child welfare system in Milwaukee County. DHFS will contract with a safety service coordinator for each of the five neighborhood service delivery sites. These coordinators will be responsible for managing the safety services program and providing safety services managers and providers.

During the period of service, an assigned safety services manager and provider will work with the family to assist them in controlling for child safety, stabilizing family functioning, and accessing necessary formal and informal supports. Families will receive services that are appropriate to their specific situation as determined by the assessment social worker and the safety services manager.

Child Welfare Prevention Services

Under the administration of DHFS, the state will coordinate, implement, evaluate and manage a comprehensive and collaborative program to prevent child abuse and neglect in Milwaukee County. This lead agency will sub-contract with community-based organizations to provide services to families to prevent child abuse and neglect in Milwaukee County.

SEGREGATED STATE TANF PROGRAMS

Department of Workforce Development

As delineated in the preamble to the final Federal TANF Regulations, many factors contribute to poverty and dependency, and solutions to these problems should not be “one size fits all.” The system should allow States and localities to develop diverse and creative responses to their own problems. Wisconsin has taken this opportunity provided under TANF to partner with communities and other organizations to serve families in new, more creative, and more effective ways. The following programs are part of the State’s TANF program and are funded with either co-mingled TANF and state funds or segregated funds.

Child Support Pass-Through

Cooperation with the child support agency is a requirement for receipt of W-2 services. Wisconsin has been given authority to operate a Child Support Demonstration waiver project to pass collected child support directly to W-2 participants. Under W-2, individuals participating in an employment position receive all or a portion of the current child support money collected each month, depending on their random group assignment. W-2 applicants are assigned to one of three groups: control, experimental or non-experimental (After July 1999 all new W-2 participants have been assigned as non-experimental).

Participants assigned to the experimental and non-experimental groups directly receive all child support paid for current support or paid for arrears accrued when receiving W-2 cash assistance. Prior to July 1, 2002 participants in the control group received up to \$50 or the state share (41%) of the child support collected, whichever was greater. After July 1, 2002 as part of the second phase of this waiver, the control group participants will receive the same child support pass through as the experimental and non-experimental groups.

Child support received by the family is not used to determine eligibility for W-2 and does not affect W-2 payments. The state share of the amounts passed through to W-2 recipients are in Wisconsin’s Maintenance of Effort (MOE) calculation.

Human Services

Wisconsin received federal approval in the FFY 1995 JOBS Supportive Service Plan to include human service expenditures made on behalf of AFDC recipients as eligible for federal reimbursement. Services listed in the Supportive Services plan include child care; family preservation services; and AODA and mental health services not covered under the Medicaid program. The costs of the services which are associated with the assignment of non-medical alcohol and drug abuse activities and mental health services to enable participation in the W-2 program and obtain and/or maintain successful employment, are not covered by Medicaid. To the extent local agencies identify non-federal resources spent on TANF-eligible individuals, Wisconsin will include these amounts in its MOE calculation.

Child Care

Wisconsin provides child care subsidies to families whose income is less than 185 percent of the FPL regardless of whether they are or have been on welfare. Families may remain eligible with income up to 200 percent of the FPL. There are no time limits for family eligibility and parents in W-2 child care have the option of selecting a child care provider from a wide variety of choices. Eligibility for child care is determined by W-2 agencies.

In addition to using the Child Care Development Fund (CCDF) and state general purpose revenues, TANF funds are also used to pay for child care for participants in W-2 and for low-income working parents. The child care subsidy is not counted as assistance for parents in unsubsidized employment. Child care subsidies paid for by TANF funds will be governed by the same policies as subsidies funded by CCDF. These policies include eligibility criteria (but no asset test) as well as a co-payment requirement provision. Wisconsin plans to transfer at least 20 percent of the TANF block grant to the CCDF as allowed under PRWORA.

Employment Transportation Program and Job Ride

Reliable, affordable and efficient transportation is critical to self-sufficiency. Wisconsin has made it a priority to work with job seekers, employers and local service providers to address transportation needs for low-income families. Employment and training staff (W-2 agencies, Job Centers, other local partners) work closely with Community Steering Committees, Children's Services Networks, existing transportation service providers, Regional Planning Commissions, Metropolitan Planning Organizations and employers to determine the best use of existing resources and the best methods to meet the employment transportation needs in their communities.

W-2 agencies use innovative methods to meet participant transportation needs such as arranging van pools, setting up volunteer driver programs, accessing loan resources for personal vehicle purchase and repair, encouraging employer-based transportation programs, expanding transit hours and service areas and hiring transportation coordinators. These programs are available to people who are enrolled in a component of the W-2 program and are generally offered on an individual basis.

DWD also operates the Job Ride Program in Milwaukee County. This reverse commute vanpool program provides transportation assistance to low income, central city workers trying to access suburban jobs. The employers targeted are not currently accessible by public transportation or other means of regularly scheduled transit. Many inner city residents who have lost employment opportunities have found it difficult to reach areas where jobs are being created (suburbs) and will have a better opportunity to obtain and retain employment with this transportation program. The job ride program is funded with state dollars.

DWD has created a joint grant program with the Department of Transportation (DOT), called the Wisconsin Employment Transportation Assistance Program (WETAP). This program uses TANF funds, DOT Transportation Demand Management (TDM) funds, and local dollars to match and draw down Job Access and Reverse Commute (JARC) dollars from the Federal Transit Administration. This has allowed Wisconsin to maximize resources and encourage even greater coordination and collaboration among local providers. The objectives of the program are to help low income individuals and families obtain, retain, and advance in employment. All transportation activities are eligible, but they must be based on needs assessment and local planning.

The grant program began April 1, 2000. Local agencies, authorities, non-profits, and tribal governing agencies are eligible to apply. Local collaboration between all interested parties is required for needs assessment, plan development, and local implementation. Applicants are required to demonstrate a quantifiable need for assistance and develop a detailed action plan to serve the TANF population. The plan requires input from employers and potential participants.

Because the program includes a mix of funding sources, eligibility criteria are varied. This allows for increased flexibility at the local level. With regard to the TANF dollars, all current and

potential W-2 participants, food stamp recipients, and others receiving supportive services and whose gross income is at or below 200 percent of the FPL are eligible for assistance. WETAP further enhances the strong commitment Wisconsin has made to helping low-income families overcome employment transportation barriers.

Job Access Loans

Job Access Loans (JALs) are short-term, no interest loans designed to meet expenses related to obtaining or maintaining employment. JALs are designed for an individual needing assistance because of a discrete financial crisis that cannot be resolved with personal resources and other funding sources are not available. This crisis, if unresolved, could develop into a long-term problem in which the individual may become dependent upon a W-2 employment position. The individual must meet financial and non-financial eligibility conditions under the W-2 program.

The W-2 agency can approve a JAL from \$25 to \$1600. Some examples of appropriate use of JALs include:

- Car loans for purchase of a vehicle or repairs to provide transportation to work or to look for work;
- Fees for obtaining a drivers license;
- Clothing/uniforms for work;
- Rent or security deposits, to prevent eviction and enable the individual to obtain or maintain employment; and
- Self-employment/entrepreneurial activities. As a condition of any self-employment or entrepreneurial loan, the W-2 agency must require a business plan approved by a traditional loan institution or an organization specializing in entrepreneurial efforts, such as the Wisconsin Women's Business Initiative Corporation or the National Foundation for Training Entrepreneurship.

The W-2 agency has sole discretion in determining and authorizing JALs. The loan recipient must develop a repayment plan approved by the W-2 agency. The loan may be paid back in cash or through a combination of cash and volunteer community work.

Emergency Assistance

The Emergency Assistance (EA) program is designed to meet the immediate needs of eligible persons facing a current emergency. The emergency must be due to fire, flood, natural disaster, energy crisis, impending homelessness, or homelessness. EA is intended to avoid destitution of a child and provide living arrangements for the child in a home. It is not necessary for individuals to receive any other forms of public assistance in order to receive EA. W-2 agencies are responsible for administration of EA. However, in Milwaukee, the EA is administered by the Milwaukee County Human Services Agency through a subcontract with the American Red Cross.

An EA group must contain a child under age 18 and a caretaker relative with whom a child is living. Each member of the EA group must be a resident of Wisconsin and a citizen or qualifying alien, as defined under W-2 policy. The amount of the EA payment is the lower of:

- \$150 for each eligible EA group member;
- the amount requested by the group; or
- the total financial need due to the emergency.

The actual amount of necessary unpaid monthly expenses (housing, food, utilities, transportation, medical and child care) is considered when determining the total financial need of the group. If an individual does not agree with the agency's decision regarding EA eligibility or payment amount, a W-2 Fact Finding Review may be requested.

Workforce Attachment and Advancement

The Workforce Attachment and Advancement (WAA) program provides funding to W-2 agencies and Workforce Development Boards (WDBs) to develop innovative employment retention and advancement strategies for the TANF eligible population.

Through WAA, W-2 agencies and WDBs will work collaboratively with employers, training providers, educational institutions, organized labor and other partners in the employment and training services delivery system to provide a variety of services tailored to the needs of their local communities. The primary objective of the program is to promote upward mobility through training that prepares persons for higher-paying employment.

The WAA funds will serve the TANF-eligible population of low-income families and noncustodial parents under 200% of poverty. In addition, the funds may be used to provide services to employers to assist with retention and advancement of the TANF-eligible population. Agencies receiving WAA funds are expected to seek extensive input from local stakeholders on what services will be provided under the program. While the local W-2 agency and WDB allocations are made in two separate funding tracks, services under the WAA will be delivered in an integrated manner.

To receive funding, each W-2 agency and WDB was required to submit a plan by January 15, 2000, for approval by the Department. Each plan includes a program description, local planning process, outreach and enrollment strategies, target populations, performance outcomes, and scope of work. Local W-2 agencies and WDBs had the option to submit separate, joint or combined plans.

Grants to the Boys & Girls Club of America

The Department will provide grants to the Boys & Girls Club of America in Wisconsin to provide services through their Gang Outreach Program. The project represents 23 distinct Boys & Girls Club organizations with 30 program sites located throughout the State of Wisconsin. The objectives of the program are to improve the social, academic and employment skills of low income, TANF eligible youth, from five to 18 years of age, whose family income does not exceed 200 percent of the FPL.

Literacy Grants

Illiteracy is one of the common barriers many of the individuals remaining in W-2 face. Literacy grants reinforce for W-2 participants and agencies the importance of literacy. These grants, administered in coordination with the Governor's Office of Literacy, provide services to TANF eligible individuals and children at or under 200 percent of the FPL. Grants are provided directly to existing literacy providers for adult literacy services, workplace literacy services and tutoring plan services for children. The literacy providers collaborate with the W-2 agency to ensure that services are provided to W-2 participants as needed. Once individuals are identified as likely to benefit from these services, the literacy providers offer one-on-one tutoring as well as small group instruction. The literacy providers work with participants to develop literacy goals and monitor progress and outcomes.

English for Southeast Asian Children

The Wausau School District will utilize TANF funding for a program to teach English to three-, four-, and five-year old Southeast Asian children to promote success in school among families in the Southeast Asian community.

Department of Health and Family Services

Domestic Abuse Services

DHFS will use TANF funds to support the following domestic violence services:

- grants to each of 30 domestic violence agencies to fund additional support services for victims of domestic violence and their children, such programming to enhance safety and self-sufficiency; legal advocacy; and programming for children who have witnessed domestic violence;
- grants to organizations to provide domestic violence services to members of traditionally under-represented populations, including racial/ethnic minority groups and persons with disabilities;
- funding to the Wisconsin Coalition Against Domestic Violence to support a staff person to provide assistance in obtaining legal services for victims from under-represented populations.

TANF funds will target families with minor children, with income at or below 250 percent of poverty. Agencies must either obtain income information or eligibility information for another relevant program (e.g., W-2, food stamps, energy assistance, Medicaid, free or reduced school lunch, child care assistance) to determine who qualifies as TANF-eligible.

Kinship Care

Through the federal block grant funded under TANF, Wisconsin provides a cash benefit called a Kinship Care payment to specified relative caretakers of a minor. This is a child-only payment. Relative caretakers are providing a service that allows displaced children to remain in the care of their extended family. The Kinship Care program preserves the ability to place children with relatives while providing appropriate oversight of placements to ensure children's safety and well-being. The Division of Children and Family Services in the Wisconsin Department of Health and Family Services (DHFS) oversees the administration of the program. As a child-only benefit, there is an assumption that these children are truly needy and generally have no income of their own with the possible exception of child support. If the child support payment exceeds \$215 (amount of Kinship Care benefit per child), the child is not eligible for Kinship Care.

Relative caretakers are not required to participate in W-2 work training placements to receive financial support for the children. W-2 is a work-based system intended to provide opportunities to parents to provide for their children. Relatives caring for children who are not their legal responsibility are providing a service to the child and the community and have no work requirements.

Under Kinship Care, relative caretakers are eligible for a child only benefit if all of the following conditions are met:

1. The Kinship Care relative applies to the county or tribal social/human services child welfare agency. The agency completes an assessment and determines if there is a need for the

child to be placed with the kinship care relative and if the placement with the kinship care relative is in the best interest of the child.

2. The county or tribal social/human services agency determines that the child meets one or more of the criteria specified in s. 48.13, Stats., or s. 938.13, Stats., or that the child would be at risk of meeting one or more of those criteria if the child were to remain in his or her home. (Note: These statutory sections relate to children in need of protection or services. The chapter numbers relate to the Children's Code and the Juvenile Justice Code.)
3. The county or tribal social/human services child welfare agency conducts a criminal background check on the kinship care relative, any other adult resident of the kinship care relative's home and any employees or prospective employees of the kinship care relative who have or would have regular contact with the child. The primary purpose of the background check is to determine if they have any arrests or convictions that could adversely affect the child or the kinship care relative's ability to care for the child.
4. The Kinship Care relative cooperates with the county or tribal social/human services agency in the application process, including applying for other forms of assistance for which the child may be eligible.
5. The child for whom the kinship care relative is providing care and maintenance is not receiving supplemental security income (SSI) or state supplemental payments.

The Kinship Care payment amount is similar to previous AFDC payment levels in Wisconsin--\$215 per child per month. In addition, kinship care children will remain non-financially eligible for Medicaid and food stamp benefits. The income and assets of kinship care relative caretakers are not considered in the kinship care eligibility determination. A kinship care eligibility review must be completed at least every twelve months.

SSI Caretaker Supplement

W-2 legislation provides that an individual who is a recipient of SSI is not eligible for participation in a W-2 employment position. Recipients of SSI have been determined permanently disabled, incapable of supporting themselves through employment, and therefore not appropriate for placement in a time-limited employment program.

To help with the support of SSI recipients' dependent children, a monthly benefit funded under TANF and state general purpose revenue (GPR), called SSI Caretaker Supplement (CTS), is issued for each eligible child who meets all of the following criteria:

1. The child's sole custodial parent receives SSI or the child lives with both custodial parents and both receive SSI. In either circumstance, the caretaker(s) receive \$250 for the first eligible child and \$150 for each subsequent eligible child.
2. The child meets financial and non-financial AFDC eligibility criteria. If the family passes the AFDC eligibility test, the CTS payment is made.
3. The child does not receive SSI benefits.

The CTS program is separate from the W-2 program and is administered by Wisconsin's DHFS, Division of Supportive Living.

Wisconsin Statewide Child Welfare Information System (WISACWIS)

Administered by DHFS, WISACWIS is an automated system that assists caseworkers and administrators in managing child welfare services, including intake, eligibility determinations, case management, court processing, financial reporting, and administration. TANF funds are being used to support the portion of implementation and ongoing support costs related to the Kinship Care program.

Brighter Futures and Tribal Adolescent Services Programs

Under the Administration of the Department of Health and Family Services, the Brighter Futures and tribal adolescent services programs award TANF-funded grants to nonprofit corporations and public agencies in Milwaukee County, county social services agencies in other counties, and Native American tribes or bands. The purpose of the grants is to fund programs for the prevention of youth violence, substance use and abuse, child abuse and neglect, and nonmarital pregnancy, and for the promotion of adolescent self-sufficiency.

Department of Public Instruction

Head Start Expansion

Through a transfer of TANF funds, the Department of Public Instruction will expand the number of Head Start programs that provide full-time care, in order to support low-income parent's work efforts. Additional emphasis will be put on developing Early Head Start programs.

Child Abuse and Neglect Prevention Board

Family Resource Centers

The Children's Trust Fund will utilize TANF dollars to support 17 Family Resource Centers around the state. Family Resource Centers primarily focus on parents and their children from birth to age three. Recognizing that all parents need help at some time, but that not all families need the same kind or intensity of support, Family Resource Centers have developed a wide range of services to meet the individual needs of community. The Family Resource Centers will use TANF funding to provide additional services for families up to 200 percent of the FPL including: parenting skills training; programs and local media campaigns to promote responsible fatherhood and increase the capacity for fathers to support their children emotionally; and activities to promote parental access and visitation.

Department of Revenue

TANF-Funded Earned Income Tax Credit

Beginning in FFY 99, Wisconsin's Department of Revenue provides a TANF-funded earned income tax credit (EITC) for the refundable portion of the Wisconsin's EITC program for low-income families. All families receiving the state credit are determined to be categorically eligible for TANF. (Note: Nonrefundable amounts and EITC payments made to qualified aliens are paid with state tax revenues).

This credit provides a supplement to the wages and self-employment income of lower-income workers with children living with them. Under the Wisconsin program, persons may be eligible to receive the tax credit if they or their spouse worked full or part-time during the tax year, had at least one qualifying child, were a full-year resident of Wisconsin, and qualified for the federal EIC. The state credit is calculated as a percentage of the federal credit as follows: four percent for families with one child; 14 percent for families with two children; and 43 percent for families with three or more children.

SEPARATE STATE PROGRAMS

Wisconsin operates several programs in addition to the federal TANF programs that are funded exclusively with state funds. These programs serve needy families that are ineligible per TANF restrictions (42 USC 608) and other low-income persons. Expenditures under these Separate State Programs will be distinctly tracked in the state's accounting system and will be counted toward the state's MOE requirement for TANF.

W-2 Services for Qualified Aliens

The State of Wisconsin provides benefits and services to qualified aliens without regard to the restrictions found under 8 USC 1612 and 1613. The following qualified aliens may be eligible for W-2, subject to the same eligibility determination used for citizen applicants:

- An alien lawfully admitted to the United States for permanent residence under the Immigration and Nationality Act;
- An alien granted asylum under section 208 of such Act;
- A refugee admitted to the United States under section 207 of such Act;
- An alien paroled into the United States under section 212(d)(5) of such Act;
- An alien whose deportation is being withheld under section 243(h) or 241(b)(3) of such Act;
- An alien granted conditional entry pursuant to section 203(a)(7) of such Act as in effect prior to April 1, 1980;
- An alien who has been certified as a victim of trafficking;
- An alien who is granted status as a Cuban and Haitian entrant, as defined in section 501(e) of the Refugee Education Assistance Act of 1980;
- An American Indian born in Canada who is at least 50% American Indian by blood, or born outside of the United States who is a member of a federally-recognized Indian tribe;
- A alien who has been battered or whose child has been battered;
- An alien admitted to the United States as an Amerasian immigrant, as described in section 584 of the Foreign Operations, Export Financing, and Related Programs Appropriations act of 1988;
- An alien lawfully residing in the United States who is an honorably discharged veteran, in active duty in, or the spouse or unremarried surviving spouse (under specified circumstances) of a veteran or active member of the U.S. armed forces; or
- An alien lawfully residing in the United States who is authorized to work by the Immigration and Naturalization Service.

W-2 Interim Assistance Program

Adults who have filed an application for SSI and are waiting for a determination of SSI eligibility, and who meet all other W-2 eligibility requirements, will be enrolled in the W-2 Interim Assistance Program. Under this program, the participant will be placed in either a CSJ or a Transition position while the SSI eligibility decision is pending. A participant found eligible for SSI benefits will no longer be eligible for W-2 Interim Assistance. A participant who is denied SSI benefits will be transferred from the Interim Assistance Program to the W-2 program and placed in appropriate W-2 employment activities.

W-2 requires that a participant apply for other public assistance programs for which s/he may be eligible. This provision was included so that individuals who more appropriately should be served under the SSI program or another disability program could apply, be determined eligible, and move from W-2 to that program. The W-2 eligibility criteria also provide that an individual who is a recipient of SSI is not eligible for participation in a W-2 employment position.

Some W-2 participants would be eligible for SSI based on a disability determination. However, the federal Social Security Administration (SSA) has issued a policy requiring the entire W-2 benefit to be counted in the SSI income test if the SSI application was filed by the family member participating in a W-2 employment position and the W-2 benefit is funded with federal money. This federal policy interpretation would virtually disqualify all W-2 participants from becoming eligible for SSI because of excess income. By providing financial assistance through a state funded program, Wisconsin has eliminated the receipt of W-2 benefits as a barrier to SSI eligibility.

Children First Program

Children First is a program which promotes the emotional and financial responsibility of the non-custodial parent to his or her children. The non-custodial parent, who has no current means of meeting a child support obligation, is behind in child support payments and does not work full-time, may be ordered by the court to participate in the Children First program. Judges are given the discretion to determine which non-custodial parents should be referred to the program based on their lack of financial resources and, therefore, no uniform income eligibility requirements have been set. The Children First program operates concurrently with the W-2 program. Federal approval for the use of waiver savings funds for Children First was received on January 4, 1993.

The Children First program requires a court order mandating non-custodial parent participation in the program. The program provides, at a minimum, job search assistance, work experience, education, training opportunities and case management services designed to enable eligible non-custodial parents to obtain and retain employment. The overall result, that of developing a bond between the non-custodial parent and the child(ren) and a communication line between the non-custodial parent and the custodial parent, is essential.

The Children First program is successfully completed when a participant makes full child support payments for three consecutive months or completes 16 weeks of employment and training activities. If these goals are not achieved, the participant may be referred to court for appropriate disposition. A crucial element to the success of the program is the partnership between the court system, the child support agency and the administering Children First agency.

Department of Health and Family Services

Substance Abuse Services

DHFS solicited proposals to provide new or expanded community-based alcohol and other drug abuse treatment programs that meet the special needs of TANF eligible individuals, with problems resulting from alcohol or other drug abuse (AODA) in Milwaukee County. The grants were awarded based on the programs' ability to emphasize parent education, vocational and housing assistance and coordination with other community programs and with treatment under intensive care.

Burials

Funding is available when a W-2 participant (individuals placed in W-2 work training placements, custodial parents of infants, and W-2 group members) dies and the estate of the deceased recipient is insufficient to pay the funeral, burial and cemetery expenses of the deceased recipient. The lesser of \$1,000 or the cemetery expenses that are not paid by the estate of the deceased and other persons and the lesser of \$1,500 or the funeral and burial expenses not paid by the estate of the deceased and other persons may be paid. No payment

is made for funeral and burial expenses if the costs for funeral and burial expenses exceed \$3,500. No payment is made for cemetery expenses if the costs for cemetery expenses exceed \$3,500 [s. 49.30, Stats.]. Costs for these burials will be paid with segregated state funding, which Wisconsin will include in its MOE calculation.

Food Stamp Benefits for Qualified Aliens

Effective August 1, 1998, the State of Wisconsin provided state-funded food stamp benefits to qualified aliens and their dependent children who were made ineligible for food stamps solely due to provisions of PRWORA. The State is using eligibility determination and benefit levels used by the federal Food Stamp Program. FSET Services for those qualified aliens who would be mandatory participants under current federal guidelines are being provided under this program. Effective November 1, 1998, those qualified aliens newly eligible for federal food stamps benefits under the provisions of Public Law 105-185, the Agriculture Research, Extension, and Education Reform Act of 1998 (AREERA) will be removed from the state-funded program.

